

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

[Enter your name, address and telephone number]

Joseph Threston, Esq.

307 7th Street

Riverton NJ 08077

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In Re:

[Enter the debtor's name(s)]

THOMAS TAGGART

Case No.:

21-14250-ABA

[Enter the case number]

Chapter:

13

[Enter the chapter]

Hearing Date:

[Enter the hearing date]

Judge:

Altenberg

[Enter the judge's last name]

**CERTIFICATION OF RYAN HALL IN SUPPORT
OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, RYAN HALL, submit this Certification in support of the Motion for Relief from the Automatic Stay filed on May 21, 2021, and which I was noticed on by counsel for a third party on August 9, 2021.

1. I am the owner of the property that is occupied by Debtor without a lease, ownership, or any other claim of right.
2. The property is located at 7236 Walnut Avenue, Pennsauken.
3. The debtor filed for Chapter 13 Bankruptcy on May 21, 2021.
4. I started an ejectment action in the New Jersey state court and a copy of the Complaint as filed is attached as Exhibit "A".
5. I obtained an Order of Possession which is set to presently expire on August 26, 2021 and a copy of the Order is attached as Exhibit "B".
6. I am seeking relief from the automatic stay to the extent that it may apply to enforce the Judgment of Possession and to keep Debtor and his mother, Kristine Keyes, from further delaying their removal of the premises through the dilatory conduct of Ms. Keyes and her lawyer, Joshua Thomas, Esq.
7. There are no rental payments at issue since there is no rental agreement.

EXHIBIT "A"

JOSEPH T. THRESTON, ESQ.
 LAW OFFICES OF JOSEPH T. THRESTON, III
 307 7TH Street
 Riverton NJ 08077
 (856) 303-1310
 Attorney No. 044621989
 jttlaw@aol.com

Attorney for Plaintiff RYAN HALL

_____)	SUPERIOR COURT OF NEW JERSEY
RYAN HALL,)	LAW DIVISION, SPECIAL CIVIL PART
)	CAMDEN COUNTY
)	
Plaintiff,)	
)	DOCKET NO. DC-
v.)	
)	CIVIL ACTION
)	
KRISTINE KEYES AND ALL OTHER)	VERIFIED COMPLAINT IN SUPPORT OF
OCCUPANTS,)	ORDER TO SHOW CAUSE (EJECTMENT)
)	
Defendant.)	
_____)	

The plaintiff herein, RYAN HALL, owner of 7236 Walnut Avenue, Pennsauken Township, Camden County, New Jersey, complains and alleges of the defendants as follows:

1. Plaintiff is the owner of 7236 Walnut Avenue, Pennsauken Township, Camden County, New Jersey.
2. Defendants KRISTINE KEYES and any other occupant on the premises at 7236 Walnut Avenue, Pennsauken Township, Camden County, New Jersey reside there without the consent of Plaintiff.
3. Defendants' actions have unlawfully prevented Plaintiff access to the premises to which Plaintiff has a legal right thereto.

4. Plaintiff seeks an immediate judgment for unlawful detainer and for the right of possession, so that uninterrupted possession of the subject premises may be restored to the Plaintiff, including costs of suit, and other relief as the court may deem appropriate.

5. There is no landlord/tenant relationship between the Plaintiff and Defendants.

6. There is no domestic violence order, current family court matter or order between the parties.

7. Plaintiff notified Defendants in writing demanding that they leave and/or deliver to Plaintiff uninterrupted possession of the subject premises on or about by mailing a request to her via regular and certified mail. Defendants have refused to leave and/or deliver the premises to the Plaintiffs.

8. Plaintiff has also made several other inquiries and/or "cash for keys" offers for the Defendants to vacate, and they have all been rejected.

9. Plaintiff has been deprived of their property, in violation of N.J.S.A. 2A:35-1 et seq. and/or N.J.S.A. 2A:39-1 et seq.

WHEREFORE, Plaintiff, RYAN HALL demands judgment against the defendants:

- A. Requesting an Order for a Writ of Possession directing the Camden County Sheriff to remove the defendants;
- B. Awarding Plaintiffs damages, counsel fees and court costs pursuant to N.J.S.A. 2A:35-1 et seq. and/or N.J.S.A. 2A:39-1 et seq.; and
- C. Any other relief the Court deems appropriate and necessary.

Dated: February 19, 2021

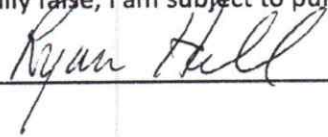


JOSEPH THRESTON, ESQ, Attorney for
Plaintiff RYAN HALL

VERIFICATION

1. I am the Plaintiff in the within action.
2. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the statements made herein by me are willfully false, I am subject to punishment.

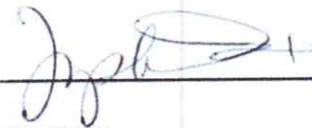
Dated: February 19, 2021



R. 4:5-1 CERTIFICATION

I certify that the matter in controversy is not the subject of any other action pending in any court or a pending arbitration proceeding, and no such action is contemplated. I know of no other parties that should be made part of the lawsuit. I recognize my continuing obligation to file and serve on all parties and the Court any amended certification, if there is a change in the facts stated in the original certification.

Dated: February 19, 2021



R. 1:38-7 CERTIFICATION

I certify that any of the defendant's confidential identifiers have been redacted from the documents submitted to the Court and will be redacted from any documents submitted in the future, in accordance with R. 1:38-7(b).

Dated: February 19, 2021

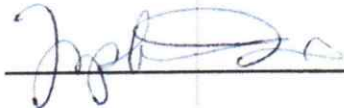


EXHIBIT "B"

LAW OFFICES OF JOSEPH T. THRESTON, III
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Attorney for Plaintiff RYAN HALL

RYAN HALL,)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION, SPECIAL CIVIL PART
)	CAMDEN COUNTY
Plaintiff,)	
)	DOCKET NO. DC-1574-21
v.)	
)	CIVIL ACTION
KRISTINE KEYES AND ALL OTHER)	
OCCUPANTS,)	
)	WRIT OF POSSESSION AND ORDER TO EJECT
Defendant.)	

THE STATE OF NEW JERSEY TO THE SHERIFF OF CAMDEN COUNTY:

WHEREAS, on March 12, 2021, by a certain Judgment of the Superior Court, Law Division, Special Civil Part, Camden County, in a cause therein pending, wherein RYAN HALL is the Plaintiffs and KRISTINE KEYES AND OTHER OCCUPANTS are the Defendants, it was ordered and adjudged that the Plaintiffs recover the possession of the lands and premises, with appurtenances, described in the Complaint as the premises located at:

7236 Walnut Avenue, Pennsauken Township, New Jersey 08109

the possession of which the Defendants have unlawfully deprived the Plaintiff; and

WHEREAS on July 8, 2021, an Amended Order of Possession was executed by Richard Wells, J.S.C., Retired, on Recall ordering the removal of the Defendant, KRISTINE KEYES, from the premises pursuant to the March 12, 2021 Judgment of the Court; and

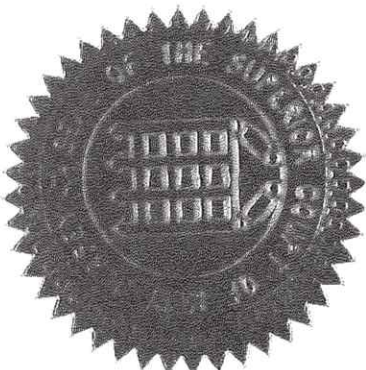
WHEREAS the removal of the Defendants is in the interests of justice as that term is defined by Executive Order No. 106 (2020), and the interpretation of the courts;

THEREFORE, IT IS ORDERED that the Sheriff of Camden County PROCEED WITH THE EJECTMENT OF KRISTINE KEYES and ALL OTHER OCCUPANTS from the above-described premises as soon as possible in accordance with the Order submitted herein and restore Plaintiffs to possession of their property and return this writ to the Office of the Special Civil Part within ^{30 D.R.}~~14~~ days of issuance.

WITNESS, the Honorable Richard Wells, Judge of the Superior Court at Camden, New Jersey this 26th day of July, 2021.

Certification of Execution of Writ for Possession

Date and Time Executed: _____



Signature of Sheriff's Officer

Printed or Typed Name of Officer